

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARK I. SOKOLOW, *et al.*,

Plaintiffs,

vs.

THE PALESTINE LIBERATION  
ORGANIZATION, *et al.*,

Defendants.

No. 04 Civ. 00397 (GBD) (RLE)

**PLAINTIFFS' OBJECTIONS AND CROSS-DESIGNATIONS TO DEFENDANTS'  
COUNTER-DESIGNATIONS**

<b><u>HUSSEIN AL SHEIKH (April 1, 2009)</u></b>		
<b>Defendants' Counter-Designations</b>	<b>Plaintiffs' Objections</b>	<b>Plaintiffs' Cross-Designations</b>
14:14-22		
15:7-10		
15:14-15, 19-20		
16:8-21	Beyond the scope of plaintiffs' designation	
17:3-17	Beyond the scope of plaintiffs' designation	
18:24-19:17	Beyond the scope of plaintiffs' designation	
20:21-21:13	Beyond the scope of plaintiffs' designation	
22:7-10	Beyond the scope of plaintiffs' designation	
24:3-14	Beyond the scope of plaintiffs' designation	
25:14-18	Beyond the scope of plaintiffs' designation	
26:5-16		
27:17-28:6		
38:18-22		
41:25-42:9		
49:25-50:13		
56:23-57:15		
61:10-24	Beyond the scope of plaintiffs' designation; relevance	
62:11-23	Beyond the scope of plaintiffs' designation; relevance	
63:3-15	Beyond the scope of plaintiffs' designation; relevance	
64:20-65:10	Beyond the scope of plaintiffs' designation; relevance	
67:23-68:22	Beyond the scope of plaintiffs' designation (67:23 to 68:4 only)	
70:17-22		
72:14-74:6	Beyond the scope of plaintiffs' designation; Non-responsive; Lack of personal knowledge; Speculation	

<b><u>HUSSEIN AL SHEIKH (April 1, 2009)</u></b>		
<b>Defendants' Counter-Designations</b>	<b>Plaintiffs' Objections</b>	<b>Plaintiffs' Cross-Designations</b>
78:5-13		
79:21-80:9		
112:2-20		
112:24-113:4		
133:14-18		
137:13-17		
141:5-14	Beyond the scope of plaintiffs' designation	
143:12-16	Beyond the scope of plaintiffs' designation; Not evidence	
147:5-12		
150:5-151:4		
153:4-8	Beyond the scope of plaintiffs' designation	
154:2-3	Not evidence	
155:21-156:3	Beyond the scope of plaintiffs' designation; relevance	
156:7-157:3	Beyond the scope of plaintiffs' designation; relevance	
157:25-159:24	Beyond the scope of plaintiffs' designation; relevance	
160:15-25	Not evidence	
161:15-25	Beyond the scope of plaintiffs' designation; relevance	
162:25-163:4	Not evidence	
166:20-168:16	Beyond the scope of plaintiffs' designation; Lack of foundation; No personal knowledge; Relevance	
169:17-170:3		
171:24-172:22	Beyond the scope of plaintiffs' designation; relevance	
174:5-9	Beyond the scope of plaintiffs' designation	
174:12-175:3	Beyond the scope of plaintiffs' designation; Not responsive	
179:3-10	Beyond the scope of plaintiffs' designation; Relevance; Not responsive; Foundation	
179:14-180:10	Beyond the scope of plaintiffs' designation; Relevance; Not Responsive; Foundation	
199:15-18		199:19-200:2
200:3-6		200:7-9
200:10-15		200:16-18
200:19-22		200:23-201:14; 202:10-14
204:4-205:14	Not evidence	
209:20-22	Not evidence	
219:23-24	Beyond the scope of plaintiffs' designation	
220:3-11	Beyond the scope of plaintiffs' designation	

<b><u>YOTAM FELDNER (March 4, 2010)</u></b>		
<b>Defendants' Counter-Designations</b>	<b>Plaintiffs' Objections</b>	<b>Plaintiffs' Cross-Designations</b>
9:23-11:23		

<b><u>YOTAM FELDNER (March 4, 2010)</u></b>		
<b>Defendants' Counter-Designations</b>	<b>Plaintiffs' Objections</b>	<b>Plaintiffs' Cross-Designations</b>
15:20-25		
22:18-20		
23:12-13		
24:1-5		
29:1-17		29:18-30:19
31:23-32:16		
34:7-19		
34:24-35:9		
36:4-18		37:1-7
37:8-14		
74:20-75:14	Beyond the scope of plaintiffs' designation; Relevance; Lack of personal knowledge	76:5-18
75:18-76:4	Beyond the scope of plaintiffs' designation; Relevance; Lack of personal knowledge	
76:21-78:15	Beyond the scope of plaintiffs' designation; Relevance; Lack of personal knowledge	
79:8-80:7	Beyond the scope of plaintiffs' designation; Relevance; Lack of personal knowledge; Lack of foundation; Speculation	
80:10	Beyond the scope of plaintiffs' designation; Relevance; Lack of personal knowledge; Lack of foundation; Speculation	
83:14-20	Beyond the scope of plaintiffs' designation; Relevance	
83:23-84:5	Beyond the scope of plaintiffs' designation; Relevance	

<b><u>SHAUL GORDON (March 2, 2010)</u></b>		
<b>Defendants' Counter-Designations</b>	<b>Plaintiffs' Objections</b>	<b>Plaintiffs' Cross-Designations</b>
12:14-13:18	Beyond the scope of plaintiffs' designation	
15:4-16:10	Beyond the scope of plaintiffs' designation	
17:10-20	Beyond the scope of plaintiffs' designation	
18:2-17	Beyond the scope of plaintiffs' designation	
23:9-24	Beyond the scope of plaintiffs' designation	
25:10-26:14		
30:22-31:14		
32:17-34:5	Beyond the scope of plaintiffs' designation	
39:2-40:9	Beyond the scope of plaintiffs' designation	
44:23-45:5		
45:20-46:11		
47:21-48:1		
49:14-20		
51:25-52:3		
54:12-55:4		
57:6-15	Beyond the scope of plaintiffs' designation; Relevance	

<b><u>SHAUL GORDON (March 2, 2010)</u></b>		
<b>Defendants' Counter-Designations</b>	<b>Plaintiffs' Objections</b>	<b>Plaintiffs' Cross-Designations</b>
57:20-21	Beyond the scope of plaintiffs' designation; Relevance	
58:13-59:5	Beyond the scope of plaintiffs' designation; Relevance	59:6-8
59:20-22	Beyond the scope of plaintiffs' designation; Relevance	
65:5-20	Beyond the scope of plaintiffs' designation; Relevance; Not evidence; Lack of foundation	66:1-17
67:12-17	Beyond the scope of plaintiffs' designation	
67:20	Beyond the scope of plaintiffs' designation	
67:23-68:3	Beyond the scope of plaintiffs' designation	
68:16-69:9	Beyond the scope of plaintiffs' designation; Relevance; Lack of personal knowledge	
71:14-72:2	Beyond the scope of plaintiffs' designation	72:3-12
72:21-74:16	72:21-73:3 Lack of foundation; Lack of personal knowledge 73:4 - 74:16 Beyond the scope of plaintiffs' designation, relevance	
75:24-76:1		
76:3-14		76:15-21
77:13-20		
77:24-78:3		
79:25-81:14		
116:16-118:17	Beyond the scope of plaintiffs' designation	
124:21-128:4	Beyond the scope of plaintiffs' designation	
129:13-17	Beyond the scope of plaintiffs' designation	
131:2-11	Beyond the scope of plaintiffs' designation	

<b><u>MOSAAB HASSAN YOUSEF (January 10, 2012)</u></b>		
<b>Defendants' Counter-Designations</b>	<b>Plaintiffs' Objections</b>	<b>Plaintiffs' Cross-Designations</b>
18:9-17	Beyond the scope of plaintiffs' designation	134:3-6
125:4-9	Beyond the scope of plaintiffs' designation	180:14-16
125:20-126:2	Beyond the scope of plaintiffs' designation	204:3-205:5
126:6-14	Beyond the scope of plaintiffs' designation	205:11-19
127:15-18	Beyond the scope of plaintiffs' designation; Hearsay; Lack of foundation	210:4-10
127:24-128:2	Beyond the scope of plaintiffs' designation; Lack of personal knowledge	222:8-13
130:12-131:6	Beyond the scope of plaintiffs' designation; Lack of personal knowledge	
131:22-132:13	Beyond the scope of plaintiffs' designation; Lack of personal knowledge	
132:19-21	Beyond the scope of plaintiffs' designation; Lack of personal knowledge	
133:23-134:2	Beyond the scope of plaintiffs' designation; Lack of personal knowledge	

<b><u>MOSAAB HASSAN YOUSEF (January 10, 2012)</u></b>		
<b>Defendants' Counter-Designations</b>	<b>Plaintiffs' Objections</b>	<b>Plaintiffs' Cross-Designations</b>
134:7-11	Beyond the scope of plaintiffs' designation; Lack of personal knowledge	
134:12-17	Beyond the scope of plaintiffs' designation; Lack of personal knowledge	
134:20-25	Beyond the scope of plaintiffs' designation; Lack of personal knowledge	
135:12-16	Beyond the scope of plaintiffs' designation; Lack of personal knowledge	
175:19-23	Beyond the scope of plaintiffs' designation; Relevance	
177:6-8	Beyond the scope of plaintiffs' designation; Relevance	
178:13-15	Beyond the scope of plaintiffs' designation; Relevance	
178:20-25	Beyond the scope of plaintiffs' designation; Relevance	
179:16-180:12	Beyond the scope of plaintiffs' designation; Lack of personal knowledge; Lack of foundation	
185:9-186:2	Beyond the scope of plaintiffs' designation	
187:23-188:5	Beyond the scope of plaintiffs' designation; Relevance	
189:8-11	Beyond the scope of plaintiffs' designation; Relevance	
189:13-16	Beyond the scope of plaintiffs' designation; Relevance	
195:16-196:18	Beyond the scope of plaintiffs' designation; Relevance	
197:11-12	Beyond the scope of plaintiffs' designation; Relevance	
197:17-25	Beyond the scope of plaintiffs' designation; Relevance	
198:6-14	Beyond the scope of plaintiffs' designation; Relevance	
203:18-204:2	Beyond the scope of plaintiffs' designation; Relevance	204:3-205:5
205:6-10	Beyond the scope of plaintiffs' designation; Relevance	205:11-19
209:25-210:3	Beyond the scope of plaintiffs' designation; Relevance;	210:4-16
212:25-213:5	Beyond the scope of plaintiffs' designation; Relevance; Not evidence	
218:11-220:9	Beyond the scope of plaintiffs' designation; Relevance; Not evidence	
221:4-9	Beyond the scope of plaintiffs' designation; Relevance	
221:14-222:7	Beyond the scope of plaintiffs' designation; Relevance	
222:14-223:3	Vague; Relevance; Beyond the scope of plaintiffs' designation	
223:14-15	Beyond the scope of plaintiffs' designation; Relevance	223:4-13
233:2-7	Beyond the scope of plaintiffs' designation; Relevance	
233:25-234:12	Beyond the scope of plaintiffs' designation; Relevance	
235:18-236:6	Beyond the scope of plaintiffs' designation; Relevance	
236:12-21	Beyond the scope of plaintiffs' designation; Relevance; Lack of foundation; Lack of personal knowledge	
238:16-24	Beyond the scope of plaintiffs' designation; Relevance	
239:5-8	Beyond the scope of plaintiffs' designation; Relevance; Speculation	
239:10-12	Beyond the scope of plaintiffs' designation; Relevance; Speculation	
239:24-240:3	Beyond the scope of plaintiffs' designation; Relevance	

<b><u>MOSAAB HASSAN YOUSEF (January 10, 2012)</u></b>		
<b>Defendants' Counter-Designations</b>	<b>Plaintiffs' Objections</b>	<b>Plaintiffs' Cross-Designations</b>
241:4-19	Beyond the scope of plaintiffs' designation; Relevance; Speculation; Lack of personal knowledge; Lack of foundation	241:2-3, 241:20-242:11
243:8-10	Beyond the scope of plaintiffs' designation; Relevance	
249:10-24	Beyond the scope of plaintiffs' designation; Relevance	
252:9-19	Beyond the scope of plaintiffs' designation; Relevance	
253:20-254:12	Beyond the scope of plaintiffs' designation; Relevance	
257:5-10	Beyond the scope of plaintiffs' designation; Relevance	
257:18-258:5	Beyond the scope of plaintiffs' designation; Relevance, Speculation; Not Evidence	258:6-9
258:25-263:3	Beyond the scope of plaintiffs' designation; Relevance; Lack of foundation; Speculation	
263:23-264:13	Beyond the scope of plaintiffs' designation; Relevance; Not responsive	264:14-265:14
265:15-20	Beyond the scope of plaintiffs' designation; Relevance	
269:2-19, 23		
270:20-271:7	Beyond the scope of plaintiffs' designation; Relevance	271:9-15
271:17-20	Beyond the scope of plaintiffs' designation; Relevance	
275:10-15	Beyond the scope of plaintiffs' designation; Relevance	
276:2-10	Beyond the scope of plaintiffs' designation; Relevance; Not evidence	276:11-17
276:18-25	Beyond the scope of plaintiffs' designation; Relevance; Not evidence	
281:18-282:11	Beyond the scope of plaintiffs' designation; Relevance; Not evidence	282:12-14
326:11-14	Beyond the scope of plaintiffs' designation; Vague; Lack of foundation	326:15-20
327:8-15	Beyond the scope of plaintiffs' designation; Relevance	
328:4-5, 9	Beyond the scope of plaintiffs' designation; Relevance	
328:16-22	Beyond the scope of plaintiffs' designation; Relevance	328:23-329:17
329:24-330:20	Beyond the scope of plaintiffs' designation; Relevance	

<b><u>AHMED QUREI (June 17, 2010)</u></b>		
<b>Defendants' Counter-Designations</b>	<b>Plaintiffs' Objections</b>	<b>Plaintiffs' Cross-Designations</b>
11:19-12:6, 10-11		
16:11-19		
17:21-23	Not evidence	
58:5-7		57:20-58:4
62:8-11		
203:7-9	Beyond the scope of plaintiffs' designation	
203:14-204:3	Beyond the scope of plaintiffs' designation	
204:19-205:3	Beyond the scope of plaintiffs' designation	205:4-8

<b><u>AHMED QUREI (June 17, 2010)</u></b>		
<b>Defendants' Counter-Designations</b>	<b>Plaintiffs' Objections</b>	<b>Plaintiffs' Cross-Designations</b>
210:24-211:6	Beyond the scope of plaintiffs' designation; Not evidence	
239:17-240:5	Relevance; Not evidence	
240:15-19	Document speaks for itself	
240:24-241:2	Lack of Foundation, Speculation	
241:9-25	Lack of foundation; Speculation	
242:2-3	Lack of foundation; Speculation	
242:5-18	Lack of foundation; Speculation	
242:20	Lack of foundation; Speculation	
242:24-25	Lack of foundation; Speculation	
243:1-7	Lack of foundation; Speculation	
243:19-21	Vague; Lack of foundation; Relevance	
244:6	Vague; Lack of foundation; Relevance	
244:8-9	Vague; Lack of foundation; Relevance	
244:14	Vague; Lack of foundation; Relevance	
244:16-25	Beyond the scope of plaintiffs' designation	
245:2-4	Beyond the scope of plaintiffs' designation; Relevance, Non-responsive	
247:22-24	Vague; Relevance	
248:7-12	Vague; Relevance	
248:16-18	Vague; Relevance	

<b><u>ABDULLAH BARGHOUTI (June 20, 2012)</u></b>		
<b>Defendants' Counter-Designations</b>	<b>Plaintiffs' Objections</b>	<b>Plaintiffs' Cross-Designations</b>
10:3-24	Beyond the scope of plaintiffs' designation; Not evidence	

<b><u>IBRAHIM DAHBOUR (September 12, 2012)</u></b>		
<b>Defendants' Counter-Designations</b>	<b>Plaintiffs' Objections</b>	<b>Plaintiffs' Cross-Designations</b>
19:17-18		
19:24-20:3		
92:4-15	Beyond the scope of plaintiffs' designation; Non-responsive	
106:2-107:4	Beyond the scope of plaintiffs' designation; Relevance	
109:3		
109:21-23		
110:23-111:7	Beyond the scope of plaintiffs' designation; Lack of foundation; Lack of personal knowledge	

<b><u>RAJA SHEHADEH (October 13, 2013)</u></b>		
<b>Defendants' Counter-Designations</b>	<b>Plaintiffs' Objections</b>	<b>Plaintiffs' Cross-Designations</b>
9:18-19		
55:2-8	Non-responsive; lack of foundation	
90:9-91:13	Non-responsive; Lack of personal knowledge; Speculation	91:14-20; 91:25-92:15
96:6-14		
110:25-112:7	Non-responsive; Speculation; Lack of personal knowledge	112:8-13
146:3-149:9	Non-responsive; Speculation; Not evidence; Lack of personal knowledge	

<b><u>GLENN ROBINSON (October 29, 2013)</u></b>		
<b>Defendants' Counter-Designations</b>	<b>Plaintiffs' Objections</b>	<b>Plaintiffs' Cross-Designations</b>
23:12-16		
28:1-29:6		
52:8-12	Beyond the scope of plaintiffs' designation	
118:21-119:12	Speculation; Lack of personal knowledge; Non-responsive; Improperly political; Relevance	
128:22-129:5	Beyond the scope of plaintiffs' designation	
142:1-25	Beyond the scope of plaintiffs' designation	143:6-17
154:8-21	Beyond the scope of plaintiffs' designation; Lack of personal knowledge; Speculation	
207:3-24	Beyond the scope of plaintiffs' designation; Speculation; Not responsive; No personal knowledge	

<b><u>DR. LORI ALLEN (November 19, 2013)</u></b>		
<b>Defendants' Counter-Designations</b>	<b>Plaintiffs' Objections</b>	<b>Plaintiffs' Cross-Designations</b>
15:17-17:20	Non-responsive	
20:1-6		19:25
21:5-9		
28:23-24		29:1
138:5-11	Not evidence	
217:15-22	Beyond the scope of plaintiffs' designation	



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